

New Hampshire Department of Education (NHDOE)

Nita M. Lowey 21st Century Community
Learning Centers Program (21st CCLC)

Policy and Procedures Guidebook 2020-2021



Revised August 2020

NHDOE 21CCLC Policy and Procedures Guidebook

All Subrecipients receiving federal funds are required to sign General Assurances to acknowledge requirements for use of funds. The Subrecipient (the public agency receiving funds, typically the Local Education Agency) must have written policies and procedures covering administration of all the federal Title programs addressing:

- a) **Cash Management** (2 CFR 200.302(b)(6) & 200.305)
- b) **Determining the allowability of costs** in accordance with 2 CFR 200 Subpart E—Cost Principles **and the terms and conditions of the Federal award.** (2 CFR 200.302(b)(7))
- c) **Conflict of Interest** (2 CFR 200.318(c))
- d) **Procurement** (2 CFR 200.320)
- e) **Method for conducting Technical Evaluations of Proposals and Selecting Recipients** (2 CFR 200.320(d)(3) and 200.323)
- f) **Suspension and Debarment** (2 CFR 200.213)
- g) **Travel Policy** (2 CFR 200.474(b))
- h) **Equipment and Supplies** (2 CFR 200.313(d), 200.314)
- i) **Time and Effort:** Describe time and effort procedures. What type of documentation is maintained and what are the requirements of the documentation? (2 CFR 200.430(i))
- j) **Record Keeping** (2 CFR 200.333 and 200.335)

Although these policies and procedures extend beyond just Title IV-B/ Nita M. Lowey 21st Century Community Learning Center (21CCLC) programming, the New Hampshire Department of Education (NHDOE) advises you to familiarize yourself with them.

Additionally, the ***NHDOE requires Subrecipients receiving 21CCLC funds to have written policies and procedures specific to the administration of the 21CCLC program.*** Policies and procedures must be written so they can easily be understood and are easily accessible by administration, afterschool program staff, school board, parents, and community members. These stakeholders should be included as policies are developed and given the opportunity to review and provide comments. Program Directors should reference their school district's overall approval process to determine if 21CCLC-specific policies need to be approved by the district (administration and/or school board).

Policies must be easily accessible by the public. NHDOE recommends policies be made available on your program's website. Programs must include the 21CCLC logo with their written policies and procedures and on all program documents or promotional materials, including registration forms.

21CCLC programs should have a written document addressing at a minimum:

- a) **Targeting:** Priority for 21CCLC funding is given to programs that target students who may be at risk for academic failure, dropping out of school, involvement in criminal or delinquent activities, or who lack strong positive role models. [20 USC 7174(i)(1)(A)(i)(II)]. How does your program or school identify students to participate in 21CCLC? How does your program or school reach out to those student and their families to encourage participation?
- b) **Sharing of Student Data:** Program Directors must have access to 21CCLC participants' student data collected by the school. For 21CCLC Program Directors who are not employed by the school district, how will the program ensure access to student data? Describe the system in place to ensure pertinent student data, including academic records, are shared between the school district and agencies providing services while adhering to the Family Educational Rights and Privacy Act (FERPA) and Protection of Pupil Rights Amendment (PPRA) regulations.

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- c) **Fees:** The intent of 21CCLC is for targeted students to participate at no cost. No student must be turned away due to inability to pay. If a registration or programming fee is charged for students to participate, how is that fee determined? If your program or school uses a sliding scale to determine fees, how is that sliding scale determined? [Programs are reminded that establishment of sliding scale fees must take into account the relative poverty of the population to be targeted by the eligible entity (20 U.S.C. 7174(d)(2).] How are fees communicated to parents?
- d) **Monitoring– fiscal and programmatic:** Subrecipients may act as a pass-through entity, arranging for a third-party to provide services to 21CCLC participants on the subrecipient’s behalf. For example, a program may wish to hire an outside organization to provide STEM activities during enrichment time. Subrecipients are responsible for ensuring any contracted services meet the goals of the 21CCLC program and must be able to speak to how it will ensure services are connected to school-day learning. Subrecipients contracting out services must also fiscally monitor.
- e) **Attendance/ Waitlist:** Regular attendance must be encouraged. Students must attend programming for at least half of the scheduled program time to count towards daily attendance. For example, if a program operates from 3:00PM to 6:00PM, a student must attend for more than half that time (ninety minutes) to count as an attendee. How does your program follow up with families of students who are not regularly attending? How many times must a student be absent from the 21CCLC program before offering that student’s spot to a waitlisted student?
- f) **Safety:** How does your program ensure safe participation? What is your program’s emergency preparedness plan? What must staff do in case of emergency? How are safety plans communicated to students and parents?
- g) **Transportation:** How will your program ensure students participating in the program travel safely to and from the center and home? What is the protocol for parents picking up their child(ren)? What accommodations will be made for students lacking safe transportation who otherwise would not be able to attend? If services are provided at an off-site location, how will students travel safely back and forth from the school?
- h) **Snacks:** 21CCLC programs must provide afterschool snacks to participants. 21CCLC programs operating at a school or in the attendance area of a school where at least 50 percent of the enrolled children are eligible for free or reduced price meals must apply for a grant through the National School Lunch Program’s Afterschool Snack Service.
(<https://www.education.nh.gov/program/nutrition/documents/2018-nslp-afterschool-snack-service.pdf>) What resource(s) will be used to acquire snacks?
- i) **Accommodating Students:** How will your program accommodate students with physical, mental, behavioral, or emotional disabilities needing support to participate in your 21CCLC program?

Guidance for Developing Policy and Procedures

The overall goal for any policy or procedure document is for the design to be *simple, consistent, and easy to understand, and easy to use*.

Good Policies

- Are written in clear, concise, simple language.
- Address what is the rule rather than how to implement the rule.
- Are aligned with state or federal requirements. It’s good practice to include a citation for the requirement the policy is tied to. Federal citations include CFR (Code of Federal Regulations), U.S.C. (United States Code), or Title IV-B of the Elementary and Secondary Education Act (ESEA)

as amended by the Every Student Succeeds Act (ESSA). This helps serve as a reminder about what program elements are required.

- Align operations and set behavior expectations among the school district, partners, and families.
- Represent a consistent, logical framework for action.
- Clearly state “who gets what” to ensure fairness and reduce legal risk.
- Are easy for users to find.

Good Procedures

- Are tied to policies. Making explicit this relationship along with how the procedure helps the 21CCLC Program achieve its goals or strategic plan helps ensure understanding and compliance.
- Are developed with the customer/user in mind. Well developed and thought out procedures provide benefits to the procedure user.
- Conveys a sense of ownership among procedure users. For this reason, it helps to involve users in the development of procedures.
- Are easy to understand. Procedures should be written so that what needs to be done can be easily followed by all users.

Writing Style for Policy and Procedure Documents

- Concise, minimum of verbiage.
- Check for accuracy.
- Don’t include information that may be quickly outdated (e.g., names).
- Spell out acronyms the first time you use them e.g., “Students Achieving Greatness through Afterschool (SAGA)”.
- Not too technical—simple enough to be understood by someone not familiar with your program.

Resources:

You for Youth: An Online Professional Learning and Technical Assistance Resource

You for Youth is a US Department of Education-sponsored website that offers free online professional learning and technical assistance for 21CCLC programs. <https://y4y.ed.gov/> Program Directors are encouraged to utilize this resource for ideas on developing and managing 21 CCLC programs.

NHDOE recommends the following You for Youth tools for helping you to develop policies and procedures:

Sample Policies and Procedures Guidebook: <https://y4y.ed.gov/tools/sample-policies-and-procedures-guidebook>

Developing and Implementing a Safety Plan: <https://y4y.ed.gov/y4yclickandgo/developing-and-implementing-a-safety-plan/2636>

If you need additional assistance with developing your policies and procedures, You for Youth can offer individualized training coordinated through NHDOE.